

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT  
HUNTINGTON, WEST VIRGINIA

ROBERT A. FLAUGHER, as Administrator of the  
Estate of Shahnaz Rumman,

Plaintiff,

vs.

CASE NUMBER: 3:13-cv-28460

CABELL HUNTINGTON HOSPITAL, INC.;  
UNIVERSITY PHYSICIANS & SURGEONS, INC.;  
MARSHALL UNIVERSITY BOARD OF GOVERNORS;  
JESSICA K. GRANGER; CHRISTINE V. GUTIERREZ;  
DAVID C. JUDE; RANDY S. KINNARD;  
BRENDA BROWN; and Y. ALEXIS DAUGHERTY,

Defendants.

**DEFENDANT, CABELL HUNTINGTON HOSPITAL, INC.'S,  
RESPONSES TO PLAINTIFF'S INTERROGATORIES**

Defendant, Cabell Huntington Hospital, Inc., by counsel, files the following responses to Plaintiff's Interrogatories to Defendant, Cabell Huntington Hospital, served upon this Defendant on July 18, 2014, and states as follows:

- a. The information supplied in these responses is not based solely on the knowledge of this Defendant, but includes the knowledge of the party, agents, representatives and attorneys, unless privileged.
- b. The word usage and sentence structure may be that of the attorneys assisting in the preparation of these responses and, thus, does not necessarily purport to be the precise language of this Defendant.

**INTERROGATORIES**

INTERROGATORY 1: If you have obtained any written or recorded statements

concerning the occurrence referenced in Plaintiff's Complaint, then for each statement, set forth the name and address of the person who gave the statement, the name and address of the person who recorded/wrote the statement, the date the statement was made, the date the statement was recorded (if different from the date it was made), the content of the statement, and the present custodian of any such statements.

RESPONSE: Objection. Some of the information requested may be protected as attorney/client privilege, peer review or information prepared in anticipation of litigation. Without waiving this objection, the Defendant states please see privilege log attached as Exhibit A hereto.

INTERROGATORY 2: If you contend that a party, or person or legal entity not a party to this action, acted in such a manner as to cause or contribute to the occurrence referenced in the Plaintiff's Complaint, then give a complete statement of facts upon which you rely to support your contention, and provide the name, address, and telephone number of any persons with personal knowledge of facts upon which you so rely.

RESPONSE: Objection, this request is premature. This Defendant reserves the right to supplement as discovery progresses.

INTERROGATORY 3: If you know the existence of any demonstrative evidence, picture, movies, computer generated evidence, electronically stored data, power point presentations, videotapes, diagrams, x-rays, documents, radiology studies, reports, or objects (real evidence) relative to the occurrence or the issue of damages, state the nature, subject matter, date produced or obtained, and the name and address of the present custodian of each.

Aug 29 2014 12:28PM HP LASERJET FAX

page 2

**VERIFICATION**

I verify under penalty of perjury that the foregoing Responses to DEFENDANT, CABELL HUNTINGTON HOSPITAL, INC.'S RESPONSES TO PLAINTIFF'S INTERROGATORIES are true and correct pursuant to the provisions of West Virginia Code §39-1-10a.

Executed on this 29<sup>th</sup> day of August, 2014.

CABELL HUNTINGTON HOSPITAL, INC.

By: Hoyt Burdick, M.D.  
Hoyt Burdick, M.D.

Taken, subscribed, and sworn to before me, a Notary Public in and for the County of Cabell, State of West Virginia, by Hoyt Burdick, M.D.

My commission expires: 8-30-14

Robin R. Robinette  
Notary Public

[NOTARIAL SEAL]

